

**IN THE UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

In re

Chapter 9

CITY OF DETROIT, MICHIGAN,

Case No. 13-53846

Debtor.

Judge Thomas J. Tucker

**CERTIFICATION OF NO RESPONSE REGARDING
CITY OF DETROIT'S OBJECTION TO CLAIM NUMBER 201**

On October 13, 2016, the City Of Detroit ("City") filed its Objection to Claim Number 201 ("Objection") [Doc. No. 11622]. The Objection was served via first class mail upon the interested parties listed on its accompanying Certificate of Service on the same date. *See Certificate of Service* Exhibit A.

No response the Objection was filed with the Court and the time to do so has passed. The City respectfully requests that the Court enter an order in substantially the same form as the one which was attached to the Objection. *See Proposed Order* Exhibit B.

Respectfully submitted,

MILLER, CANFIELD, PADDOCK AND
STONE, P.L.C.

By: /s/ Marc N. Swanson

Jonathan S. Green (P33140)

Marc N. Swanson (P71149)

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ATTORNEYS FOR THE CITY OF DETROIT

DATED: November 10, 2016

Exhibit A

EXHIBIT 4 – CERTIFICATE OF SERVICE

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

In re:

City of Detroit, Michigan,
Debtor.

Bankruptcy Case No. 13-53846

Judge Thomas J. Tucker

Chapter 9

The undersigned hereby certifies that on October 13, 2016, he caused a copy of the *City of Detroit's Objection to Claim Number 201* to be served upon all parties registered for ECF service and by first class mail to the following parties:

Raymond Guzall III, P.C.
31555 West Fourteen Mile Road
Suite 320
Farmington Hills, MI 48334

Barry A. Seifman
Barry A. Seifman, P.C.
30445 Northwestern Hwy, #310fc
Farmington Hills, MI 48334

David W. Warren
Joelson Rosenberg, PLC
30665 Northwestern Hwy, #200
Farmington Hills, MI 48334

Michael Beydoun
6307 Heyen
Dearborn Heights, MI 48127

David B. Landry
Nancy Vayda Dembinski
Landry, Mazzeo & Dembinski PC
37000 Grand River, Ste 200
Farmington Hills, MI 48335

General Shale Brick, Inc.
c/o John Colucci
33659 Angeline
Livonia, MI 48150

Kajy Development, L.L.C.
c/o David W. Yaldo
4036 Telegraph Road, Suite 204
Bloomfield Hills, MI 48302

Dated: October 13, 2016

By: /s/ Marc N. Swanson

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Exhibit B

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

In re:

City of Detroit, Michigan,
Debtor.

Bankruptcy Case No. 13-53846

Honorable Thomas J. Tucker

Chapter 9

**[PROPOSED] ORDER SUSTAINING
CITY OF DETROIT’S OBJECTIONS TO CLAIM NUMBER 201**

This matter having come before the Court on the *City of Detroit’s Objection to Claim Number 201* (“Objection”), upon proper notice and a hearing, the Court being fully advised in the premises, and there being good cause to grant the relief requested,

THE COURT ORDERS THAT:

1. The Objection is sustained.
2. Proof of claim number 201 is allowed as a cash claim for \$20,000 and an unsecured class 14 claim in the amount of \$2,273,293.06.
3. The City’s claims agent is authorized to update the claims register in accordance with the terms of this Order.
4. Nothing in this Order in any way restricts the City’s right or ability to seek a ruling determining the rights of Michael Beydoun (current claimant under proof of claim 201) and his garnishing creditors as to the amounts to be paid out under proof of claim number 201.

5. The Court retains jurisdiction over any and all matters arising from the interpretation or implementation of this Order.